

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Michael Carrabes,
Plaintiff,
v.
Expeditors International of
Washington, Inc., Tracy
Peveri and Brian Carrabes,
Defendants.

No. 1:24-CV-12142

MOTION TO CONTINUE SCHEDULING CONFERENCE

Plaintiff Michael Carrabes ("Plaintiff"), by and through his undersigned counsel, respectfully moves this Court for a short continuance of the Scheduling Conference currently scheduled for **October 7, 2025**. In support of this motion, Plaintiff states:

1. Plaintiff's counsel has been hospitalized due to a suspected gastrointestinal bleed and dehydration.
2. Counsel is uncertain about the length of hospitalization currently. However, he had been advised by his treating physician that it will be 2 to 3 days at a minimum.
3. Plaintiff's counsel also anticipates needing a short period of 7 days to recover and resume his professional responsibilities.
4. Therefore, Plaintiff respectfully requests that the Court continue the Scheduling Conference by

approximately 10 days.

5. Plaintiff is also pleased to report that the Parties have made meaningful headway on reaching agreement regarding a joint scheduling plan and anticipate that it will be filed with the Court shortly.

LOCAL RULE 7.1 CERTIFICATION

I, undersigned counsel for Plaintiff, hereby certify that pursuant to Local Rule 7.1(a)(2) I conferred with counsel for Defendants regarding the relief requested in this motion. Opposing counsel indicated that he has no objection to a short continuance of the Scheduling Conference in light of the circumstances described herein.

Michael Carrabes, Plaintiff
By his attorney,



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